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Comments by Alex Hildebrand on Volume 1

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1) In Volume 1, Findings and Recommended Actions, item 15 under the heading of Future Uncertainties and Scenarios, it is proposed to rely in this edition of the Plan on an estimate of the 2030 water need which is derived by a 30 year extrapolation of “current trends”. There is no reference to where and how this estimate is made. The following sentences should be inserted after the first sentence in item 15.

“This estimate of 2030 water demand assumes that “current trends” will continue to be both permissible and feasible from 2000 to 2030. The estimate implicitly assumes that the current net long term overdraft (depletion) of groundwater resources will and can continue in violation of Water Code Section 1004.6. It also assumes that the water supply available to produce food and other farm products will continue to be reduced by reallocation of farm water to urban and environmental uses, including by reallocation of water to EWA, and by urban sprawl taking both farm land and the water appurtenant to that land, and by conversion of farm land to wetlands, and by the proposed land fallowing, etc. Water Code 10004.6 stipulates that the plan must propose to provide enough water to meet the state’s future needs. If the farm water supply per the plan is insufficient to produce food for the 2030 population, it will not comply with the Code.

Item 15 also states that based on the “current trends” analysis we will need XX million more acre feet of water. It then says that if that additional water was available, it would meet all needs. However, the Plan does not provide one or more lists of measures that could supply that additional water. The sentence which is now the second sentence in item 15 should be revised to say, “If the “current trends’ forecast of need is assumed to be adequate, and if measures are provided to meet the forecasted need for water, the additional water would serve 14 million more Californians, sustain California’s economy and agricultural industry, meet environmental restoration and water quality objectives, and eliminate groundwater overdraft”.

2) In Volume 1 under Recommended Actions, item 3 insert a new number (1) “The state’s role is particularly important in respect to assuring that the overall developed water supply is adequate to produce the housing materials, food, clothing, water, and other items that regions can not provide for themselves, and which must be imported from other regions to meet the growing public need.

3) In Volume 1 Strategy Investment Options Table the text acknowledges that the “water supply benefits” listed in the table are not additive among different strategies. However, even if they were additive, the total water supply benefit would only range from about 4.65 to 8 million acre feet. The plan should show that offsetting these alleged benefits about 2 million acre feet are needed to replace dependence on groundwater overdraft. Also the table is correct that water transfers do not create new water, but it should address and quantify the loss of water to the Bay that is released to maintain quality when water is transferred across the Delta. The table makes no claim that the “water supply benefits” will add up to an adequate supply. However, neither in the table nor elsewhere does the plan meet the Water Code requirement that the plan should propose one or more lists of measures which, if implemented, are estimated to be adequate to provide an adequate water supply to meet all future needs. The table does not do this. It does not include the quantified yield from new storage that will be needed in addition to the items list. It does not make it clear that any kind of storage in the Central Valley can only increase multiyear yield if it is filled with water that would otherwise flow to the Bay in excess of established outflow requirements. Do the estimates listed for water supply yield from surface and subsurface storage meet that test? If so, how do we know that? Furthermore, the figures for CALFED storage yield should indicate whether CALFED’s proposed design and operating plans are consistent with the yield claimed in the table.

4) In Volume 1, Chapter 1, changing the Water Plan, the second paragraph of the text objects to “gap estimates” Add the following sentence to the paragraph.

“However, the Water code, Section 10004.6, requires that the plan provide one or more estimates of the water supply required to supply all of California’s future needs and one or more lists of measures which if implemented would provide that supply”.